

**TENNESSEE AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-1531**



**SIGNIFICANT MODIFICATION #2 to the
OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act**

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-3-9-.02(11) of the Tennessee Air Pollution Control Regulations. The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Date Issued: March 22, 1999

Permit Number: 549846

Date of Significant Modification #2: July XX, 2006

Date Expires: March 22, 2003

Issued To:

G.F. Hardwoods, Inc.

Installation Address:

3854 Clay County Highway
Moss

Installation Description:

G. F. Hardwoods, Inc.:

14-0019-01: Boiler No.1

14-0019-02: Woodworking Operation

14-0019-03: Boiler No.2

14-0022-07: Woodworking Operation

Moss Sawmill, Inc.:

14-0020-01: Woodworking Operation

Honest Abe Log Homes, Inc.:

14-0022-01: Woodworking Operation

14-0022-02: Boiler

G. F. Hardwoods, Inc.:

14-0023-01: Wood Moulding Operation

Barky Beaver Mulch & Mix, Inc.:

14-0024-01: Chip Drying System

Emission Source Reference No.: 14-0022

Renewal Application Due Date:

Between June 25, 2002 and September 23, 2002

Primary SIC: 24

Responsible Official:

Name: J. D. Smith

Title: Manufacturing Engineer

Facility Contact Person:

Name: Doug Rich

Title: Manager-Surplus Equipment

Phone: 931.258.3661

Information Relied Upon: Application dated January 24, 2006.

(continued on the next page)

TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

POST OR FILE AT INSTALLATION ADDRESS

SECTION E

SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, AND MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

14-0012	Facility Description: Woodworking Operation
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Conditions E1 and E2 apply to all sources in Section E of this permit unless otherwise noted.

E1. Fee payment: allowable emissions basis.

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE: 14-0019, 14-0020, 14-0021, 14-0022, 14-0023, and 14-0024

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	201.0	N/A	
PM ₁₀	N/A	N/A	
SO ₂	19.6	N/A	
VOC	N/A	N/A	
NO _x	37.5	N/A	
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAP WITHOUT A STANDARD)*			
VOC FAMILY GROUP	N/A	N/A	
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAP WITH A STANDARD)**			
VOC FAMILY GROUP	N/A	N/A	
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE	N/A	N/A	

NOTES

AAP The **Annual Accounting Period (AAP)** is a twelve (12) consecutive month period that begins each July 1st and ends June 30th of the following year. The present Annual Accounting Period began July 1, 1998 and ends June 30, 1999. The next Annual Accounting Period begins July 1, 1999 and ends June 30, 2000. The next Annual Accounting Period begins July 1, 200 and ends June 30, 2002.

N/A N/A indicates that no emissions are specified for fee computation.

AEAR **AEAR** indicates that an Actual Emissions Analysis is Required to determine the actual emissions of:

- (1) each regulated pollutant (Particulate matter, SO₂, VOC, NO_x and so forth. See TAPCR 1200-3-26-.02(2)(i) for the definition of a regulated pollutant.),
- (2) each pollutant group (VOC Family, Non-VOC Gaseous, and Particulate Family), and
- (3) the Miscellaneous HAP Category under consideration during the Annual Accounting Period.

* **Category Of Miscellaneous HAP (HAP Without A Standard):** This category is made-up of hazardous air pollutants that do not have a federal or state standard. Each HAP is classified into one of three groups, the VOC Family group, the Non-VOC Gaseous group, or the Particulate (PM) Family group. For fee computation, the Miscellaneous HAP Category is subject to the 4,000 ton cap provisions of subparagraph 1200-3-26-.02(2)(i).

**** Category Of Specific HAP (HAP With A Standard):** This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-3-11 or Chapter 1200-3-31. Each individual hazardous air pollutant is classified into one of three groups, the VOC Family group, the Non-VOC Gaseous group, or the Particulate (PM) Family group. For fee computation, each individual hazardous air pollutant of the Specific HAP Category is subject to the 4,000 ton cap provisions of subparagraph 1200-3-26-.02(2)(i).

***** Category Of NSPS Pollutants Not Listed Above:** This category is made-up of each New Source Performance Standard (NSPS) pollutant whose emissions are not included in the PM, SO₂, VOC or NO_x emissions from each source in this permit. For fee computation, each NSPS pollutant not listed above is subject to the 4,000 ton cap provisions of subparagraph 1200-3-26-.02(2)(i).

END NOTES

The permittee shall:

- (1) Pay annual allowable based emission fees for the present Annual Accounting Period.
- (2) Pay major source annual allowable based emission fees, as requested by the responsible official, in accordance with the above Fee Emissions Summary Table beginning July 1, 1999 of the next annual accounting period.

The Tennessee Air Pollution Control Division will bill the permittee no later than April 1 prior to the end of each annual accounting period. The annual emission fee is due July 1 following the end of each annual accounting period. If any part of any fee imposed under TAPCR 1200-3-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in TAPCR 1200-3-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

Payment of the fee due shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.

TAPCR 1200-3-26-.02 (3) and (9), and 1200-3-9-.02(11)(e)1 (vii)

E2. Reporting requirements.

(a) **Semiannual reports.** The first report shall cover the 6-month period from July 1, 1999 to December 31, 1999 and shall be submitted within 60 days after the 6-month period (December 31, 1999). Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report. All instances of deviations from permit requirements must be clearly identified in these reports and the reports must be certified by the responsible official.

Semiannual reports of these facilities 14-0019, 14-0020, 14-0021, 124-0022, 14-0023 and 14-0024 shall include:

- (1) Reports of any monitoring and recordkeeping required by Conditions E3-2, E4-3, E5-1, E5-2, E6-4, E9-1, E9-2, E10-3, E12-5, and E13-1 of this permit.
- (2) The visible emission evaluation readings from Conditions E3-4, E4-2, E5-4, E6-5, E9-4, E10-5, E11-4, E12-7, and E13-2 of this permit if required.
- (3) Identification of all instances of deviations from ALL PERMIT REQUIREMENTS. These reports must be certified by a responsible official consistent with condition B4 of this permit and shall be submitted to the Technical Secretary at the address in Condition E2(b) of this permit.

These reports shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.

TAPCR 1200-3-9-.02(11)(e)1.(iii)

(b) **Annual compliance certification** The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (1) The identification of each term or condition of the permit that is the basis of the certification;
- (2) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;
- (3) Whether such method(s) or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (4) The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in E2(b)2 above. The certification shall identify each deviation and take it into account in the compliance certification; and
- (5) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

The first certification shall cover the 12-month period from July 1, 1999 to June 30, 2000 and shall be submitted within 60 days after the 12-month period (June 30, 2000). Subsequent certifications shall be submitted within 60 days after the end of each 12-month period following the first certification. These certifications shall be submitted within 60 days of the close of the reporting period. These certifications shall be submitted to **TDAPC and EPA** at the following addresses:

The Technical Secretary Tennessee Division of Air Pollution Control ATTN: Middle Tennessee Permit Program 9th Floor, L & C Annex 401 Church Street Nashville, Tennessee 37243-1531	and	Air and EPCRA Enforcement Branch U.S. EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303
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40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol.62, No.204, October 22, 1997, pages 54946 and 54947

TAPCR 1200-3-9-.02 (11)(e)3.(v)

(c) **Retention of Records** All records required by any condition in Section E of this permit must be retained for a period of not less than five years. Additionally, these records shall be kept available for inspection by the Technical Secretary or his representative.

TAPCR 1200-3-9-.02(11)(e)1.(iii)(II)II

DRAFT PERMIT

Pallet Pro
14-0021-01 and 14-0021-02

E7-1. Source No.'s 14-0021-01 and 14-0021-02 are no longer in operation at this facility and are hereby deleted from the permit.

G.F. Hardwoods, Inc.
14-0022-07: Woodworking Operation. A cyclone and baghouse are used for pollution control.

E13-1. Particulate matter (TSP) emitted from this source shall not exceed 6.3 pounds per hour (lb/hr).

TAPCR 1200-3-7-.03(1).

Compliance Method: Compliance with the particulate matter emission limit shall be assured through periodic monitoring and inspection of pollution control equipment (baghouses and cyclones).

Baghouse

Within 10 days of start-up of this source, the permittee shall begin taking daily pressure drop readings for the baghouse. Sixty (60) days of pressure drop (inches of water column) readings for the baghouse shall be compiled. The designated person(s) shall note any relevant baghouse conditions/problems/concerns when recording the values. This data shall be submitted to the Division, along with a proposed minimum pressure drop for the baghouse, no later than 15 days following the sixty (60) days of readings. The minimum pressure drop value for compliance assurance will be incorporated into this permit through an administrative permit amendment. All data must be entered in the log no later than seven (7) days from the end of the day for which the data is required.

After incorporation of the minimum pressure drop into the permit, compliance with the above specified particulate matter emission limit shall be assured by maintaining the required minimum pressure drop for the baghouse. The pressure drop for the baghouse shall be recorded once daily when the source is in operation. Days when the source is not operating shall be noted.

For lower pressure drop reading(s) resulting from replacement of bags, the permittee shall record the deviation(s) as such in their daily records. Due allowance will be made for lower pressure drop reading(s) which follow replacement of bags provided the permittee establishes to the satisfaction of the Technical Secretary that these lower readings resulted from the replacement of bags.

Cyclone

The cyclone shall be externally inspected daily to assure that abrasion holes and plugging problems have not developed. Any abrasion holes shall be promptly repaired. Any ductwork with plugging problems shall be remedied promptly. The permittee shall record the results of the daily cyclone inspections in a log. All data must be entered in the log no later than seven (7) days from the end of the day for which the data is required.

E13-2. Visible emissions from this source shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period, and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-3-5-.03(6) and TAPCR 1200-3-5-.01(1)

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

E13-3. Visible emissions from roads and parking areas shall not exhibit greater than ten percent (10%) opacity utilizing Tennessee Visible Emission Evaluation (TVEE) Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982 and August 24, 1984.

TAPCR 1200-3-8-.03.

- E13-4.** Fugitive emissions from this source shall be controlled as specified in Rule 1200-3-8-.01. Specifically, no person shall cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-3-20. Fugitive emissions from this source shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.
- E13-5.** Upon the malfunction/failure of any emission control device(s) serving this source, the operation of the process(es) served by the device(s) shall be regulated by Chapter 1200-3-20 of the Tennessee Air Pollution Control Regulations.
- E13-6.** The permittee shall comply with all the terms and conditions of the Title V permit #549846. Condition No.'s E1 and E2 of this Significant Modification #2 replaces Condition No.'s E1 and E2 Title V Permit No. 549846.

END OF PERMIT NUMBER: 549846

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PERMIT

ATTACHMENT 1

**OPACITY MATRIX DECISION TREE for
VISIBLE EMISSION EVALUATION METHODS 2 and 9
dated JUNE 18, 1996**

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Decision Tree PM for Opacity for

Sources Utilizing EPA Method 9

Notes:

PM = Periodic Monitoring required by 1200-3-9-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards in paragraph 1200-3-5-.01. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PM required.

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

Typical Pollutants
Particulates, VOC, CO, SO₂, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observation to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

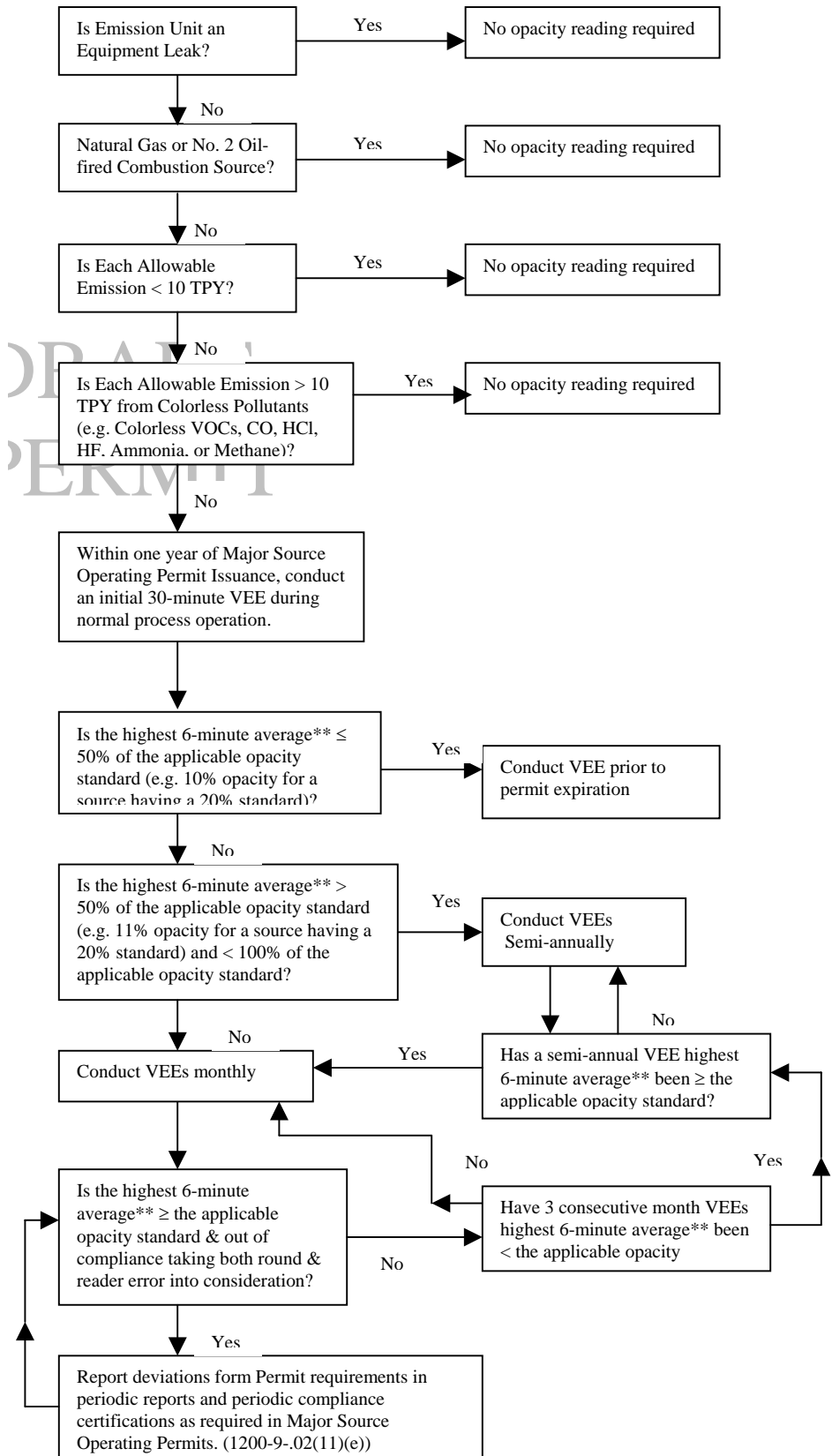
A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulate opacity standards: The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPS stipulate opacity standards: EPA guidance is to allow only engineering round. No allowance for reader error is given.

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

**Or second highest six-minute average, if the source has an exemption period stipulated in either the regulations or in the permit



**Decision Tree PMT for Opacity for
Sources Subject to Rule 1200-3-5-.01
Utilizing TVEE Method 2**

Notes:

PMT = Periodic Monitoring and Testing required by 1200-3-9-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards in paragraph 1200-3-5-.01. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PMT required.

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing Tennessee Visible Emission Evaluation Method 2. The observer must be properly certified according to the criteria specified in EPA Method 9 to conduct TVEE Method 2 evaluations.

Typical Pollutants
Particulates, VOC, CO, SO₂, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observation to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

Reader Error
TVEE Method 2: The TAPCD declares non-compliance when 21 observations are read at the standard plus 15% opacity (e.g. 35% for a 20% standard).

*The rationale for this is the fact that Rule 1200-3-5-.01 allows for an exemption of 5 minutes (20 readings) per hour and up to 20 minutes (80 readings) per day. With 4 or more excessive individual readings per hour the possibility of a daily exceedance exists.

Note: A company could mutually agree to have all of its sources regulated by EPA Method 9. Caution: Agreement to use Method 9 could potentially place some sources in non-compliance with

